



State of Ohio Environmental Protection Agency

Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087
(6) 425-9171

Richard F. Celeste
Governor

April 25 1989

RE: UCAR CARBON COMPANY, INC.

OHD 004-167-383
02 18-0132
CUYAHOGA COUNTY
G/TSD

11709 Madison Ave

Nyle Hillson
UCAR Carbon Company, Inc.
P. O. Box 94637
Cleveland, Ohio 44101

Dear Mr. Hillson:

The purpose of this letter is to summarize the results of my recent RCRA inspection of your facility, which occurred on April 5, 1989. This inspection was conducted in order to determine your facility's compliance with state and federal hazardous waste rules and regulations. Terry Wilkinson, Tony Passalacqua and yourself represented UCAR, Marian Toumazos and I represented the Ohio EPA.

You indicated during the inspection that the "Karbate" production line was sold off to another company in June of 1988. The facility has also recently submitted, for formal agency review, closure plans for the hazardous waste tank and hazardous waste container storage areas.

During my inspection the following violations were noted:

1. Several facility personnel did not receive the required annual training as required by OAC 3745-52-34(A)(4) and 40 CFR 262.34, as well as OAC 3745-65-16(C) and 40 CFR 265.16(C).
2. In the satellite accumulation area the drum containing hazardous wastes was not stored closed as required by 40 CFR 265.173 and OAC 3745-66-73, as well as OAC 3745-52-34(C)(1)(a) and 40 CFR 262.34(c)(1)(i).
3. Facility must forward a copy of the facility's contingency plan to the state emergency service authorities as required by OAC 3745-65-53(B) and 40 CFR 265.53(b).
4. The facility did not indicate in the waste analysis plan the test methods use to analyze the parameters specific to the hazardous wastes generated by the facility as required by OAC 3745-65-13(B)(2) and 40 CFR 265.13(b)(2).
5. The secondary containment system for the hazardous waste tank is not designed to contain 100% of the capacity of the tank as required by 40 CFR 265.193(e)(1)(i) and OAC 3745-6693(E)(1)(a).

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: UCAR Carbon Co.

U.S. EPA I.D. No.: OH 004 167 383

Street: 11709 Madison Ave. P.O. Box 6087

City: Cleveland State: Ohio Zip Code: 44101

Telephone: (216) 529-3751

Operator: _____

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: _____

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Inspection Date: 4/5/89 Time: 9:30 - 3:30 Weather Conditions: Cloudy

	Name	Affiliation	Telephone
Inspectors:	<u>Gregory Taylor</u>	<u>OEPA</u>	<u>(216) 425-9171</u>
	<u>Marian Toumazos</u>	<u>OEPA</u>	<u>(216) 425-9171</u>

Facility Representatives: Nyle Hillson, Tony Passalacqua
Terry Wilkinson

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator	<u>✓</u>	<u>✓</u>	_____	_____
Transporter	_____	_____	_____	_____
Treater	_____	_____	_____	_____
Storer	<u>✓</u>	<u>✓</u>	_____	_____
Disposer	_____	_____	_____	_____

INSPECTION SUMMARY

**RCRA LAND DISPOSAL RESTRICTION INSPECTION
APPLICABILITY CHECKLIST**

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>					
1.	F001	<u>✓</u>	<u> </u>	<u>✓</u>	<u> </u>	<u> </u>
2.	F002	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
3.	F003	<u>✓</u>	<u> </u>	<u>✓</u>	<u> </u>	<u> </u>
4.	F004	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
5.	F005	<u>✓</u>	<u> </u>	<u>✓</u>	<u> </u>	<u> </u>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Cadmium	100 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Chromium VI	500 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Lead	500 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Mercury	20 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Nickel	134 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Selenium	100 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Thallium	130 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm _____

500 ppm _____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

- Note: (1) The detailed description for waste codes are listed in Appendix C.
 (2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001*	_____	_____	_____	_____	_____
K004*	_____	_____	_____	_____	_____
K008*	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015*	_____	_____	_____	_____	_____
K016*	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018*	_____	_____	_____	_____	_____
K019*	_____	_____	_____	_____	_____
K020*	_____	_____	_____	_____	_____
K021*	_____	_____	_____	_____	_____
K022*	_____	_____	_____	_____	_____
K024*	_____	_____	_____	_____	_____
K025*	_____	_____	_____	_____	_____
K030*	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036*	_____	_____	_____	_____	_____
K037*	_____	_____	_____	_____	_____
K044*	_____	_____	_____	_____	_____
K045*	_____	_____	_____	_____	_____
K046*	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
K047*	_____	_____	_____	_____	_____
K048*	_____	_____	_____	_____	_____
K049*	_____	_____	_____	_____	_____
K050*	_____	_____	_____	_____	_____
K051*	_____	_____	_____	_____	_____
K052*	_____	_____	_____	_____	_____
K060*	_____	_____	_____	_____	_____
K061*	_____	_____	_____	_____	_____
K062*	_____	_____	_____	_____	_____
K069*	_____	_____	_____	_____	_____
K071*	_____	_____	_____	_____	_____
K073*	_____	_____	_____	_____	_____
K083*	_____	_____	_____	_____	_____
K084	_____	_____	_____	_____	_____
K085	_____	_____	_____	_____	_____
K086*	_____	_____	_____	_____	_____
K087*	_____	_____	_____	_____	_____
K099*	_____	_____	_____	_____	_____
K100*	_____	_____	_____	_____	_____
K101*	_____	_____	_____	_____	_____
K102*	_____	_____	_____	_____	_____
K103*	_____	_____	_____	_____	_____
K104*	_____	_____	_____	_____	_____
K106*	_____	_____	_____	_____	_____
P001	_____	_____	_____	_____	_____
P004	_____	_____	_____	_____	_____
P005	_____	_____	_____	_____	_____
P010	_____	_____	_____	_____	_____
P011	_____	_____	_____	_____	_____
P012	_____	_____	_____	_____	_____
P015	_____	_____	_____	_____	_____
P016	_____	_____	_____	_____	_____
P018	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
P020	_____	_____	_____	_____	_____
P030	_____	_____	_____	_____	_____
P036	_____	_____	_____	_____	_____
P037	_____	_____	_____	_____	_____
P039	_____	_____	_____	_____	_____
P041	_____	_____	_____	_____	_____
P048	_____	_____	_____	_____	_____
P050	_____	_____	_____	_____	_____
P058	_____	_____	_____	_____	_____
P059	_____	_____	_____	_____	_____
P063	_____	_____	_____	_____	_____
P068	_____	_____	_____	_____	_____
P069	_____	_____	_____	_____	_____
P070	_____	_____	_____	_____	_____
P071	_____	_____	_____	_____	_____
P081	_____	_____	_____	_____	_____
P082	_____	_____	_____	_____	_____
P084	_____	_____	_____	_____	_____
P087	_____	_____	_____	_____	_____
P089	_____	_____	_____	_____	_____
P092	_____	_____	_____	_____	_____
P094	_____	_____	_____	_____	_____
P097	_____	_____	_____	_____	_____
P102	_____	_____	_____	_____	_____
P105	_____	_____	_____	_____	_____
P108	_____	_____	_____	_____	_____
P110	_____	_____	_____	_____	_____
P115	_____	_____	_____	_____	_____
P120	_____	_____	_____	_____	_____
P122	_____	_____	_____	_____	_____
P123	_____	_____	_____	_____	_____
U007	_____	_____	_____	_____	_____
U009	_____	_____	_____	_____	_____

	Gen.	Treat	Store	Disp.	Trans.
U010	_____	_____	_____	_____	_____
U012	_____	_____	_____	_____	_____
U016	_____	_____	_____	_____	_____
U018	_____	_____	_____	_____	_____
U019	_____	_____	_____	_____	_____
U022	_____	_____	_____	_____	_____
U029	_____	_____	_____	_____	_____
U031	_____	_____	_____	_____	_____
U036	_____	_____	_____	_____	_____
U037	_____	_____	_____	_____	_____
U041	_____	_____	_____	_____	_____
U043	_____	_____	_____	_____	_____
U044	_____	_____	_____	_____	_____
U046	_____	_____	_____	_____	_____
U050	_____	_____	_____	_____	_____
U051	_____	_____	_____	_____	_____
U053	_____	_____	_____	_____	_____
U061	_____	_____	_____	_____	_____
U063	_____	_____	_____	_____	_____
U064	_____	_____	_____	_____	_____
U066	_____	_____	_____	_____	_____
U067	_____	_____	_____	_____	_____
U074	_____	_____	_____	_____	_____
U077	_____	_____	_____	_____	_____
U078	_____	_____	_____	_____	_____
U086	_____	_____	_____	_____	_____
U089	_____	_____	_____	_____	_____
U103	_____	_____	_____	_____	_____
U105	_____	_____	_____	_____	_____
U108	_____	_____	_____	_____	_____
U115	_____	_____	_____	_____	_____
U122	_____	_____	_____	_____	_____
U124	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U129	_____	_____	_____	_____	_____
U130	_____	_____	_____	_____	_____
U133	_____	_____	_____	_____	_____
U134	_____	_____	_____	_____	_____
U137	_____	_____	_____	_____	_____
U151	_____	_____	_____	_____	_____
U154	_____	_____	_____	_____	_____
U155	_____	_____	_____	_____	_____
U157	_____	_____	_____	_____	_____
U158	_____	_____	_____	_____	_____
U159	_____	_____	_____	_____	_____
U171	_____	_____	_____	_____	_____
U177	_____	_____	_____	_____	_____
U180	_____	_____	_____	_____	_____
U185	_____	_____	_____	_____	_____
U188	_____	_____	_____	_____	_____
U192	_____	_____	_____	_____	_____
U200	_____	_____	_____	_____	_____
U209	_____	_____	_____	_____	_____
U210	_____	_____	_____	_____	_____
U211	_____	_____	_____	_____	_____
U219	_____	_____	_____	_____	_____
U220	_____	_____	_____	_____	_____
U221	_____	_____	_____	_____	_____
U223	_____	_____	_____	_____	_____
U226	_____	_____	_____	_____	_____
U227	_____	_____	_____	_____	_____
U228	_____	_____	_____	_____	_____
U237	_____	_____	_____	_____	_____
U238	_____	_____	_____	_____	_____
U248	_____	_____	_____	_____	_____
U249	_____	_____	_____	_____	_____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing spent methylene chloride
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☐ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

_____ Yes _____ No _____ NA

If yes, check the appropriate treatability group.

_____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
 _____ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes _____ No _____ NA

How was this determination made?

- Knowledge of waste

☒ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. MSDS

- TCLP

_____ Yes _____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream: _____

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

NA

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☐ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☐ No ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. _____

- Testing _____ Yes _____ No _____ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

_____ Yes _____ No _____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____
- _____
- _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

3. First Third Wastes:

- a. Does the generator correctly determine the appropriate treatment standard of the waste?

_____ Yes _____ No _____ NA

Note: The treatment standards for first third wastes are given in Appendix D.

- b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

_____ Yes _____ No _____ Soft hammer

If yes, specify the waste stream: _____

How was this determination made?

- Knowledge of waste

_____ Yes _____ No

If yes, is any supporting data available for review? Describe how this is adequate. _____

- TCLP

_____ Yes _____ No _____ NA

- Total Constituent Analysis

_____ Yes _____ No _____ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

- d. How does the generator test the waste when a process or waste stream changes?

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes _____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes _____ No

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes _____ No

- c. Does notification contain the following?

EPA Hazardous waste number(s)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site treatment or storage facilities: Safety Kleen

- d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

- e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

- f. Does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: _____

- g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☐ Yes ☐ No ☐ NA

- h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☐ Yes ☐ No

- i. If yes, does the notification contain the following information?

EPA Hazardous waste number ☐ Yes ☐ No

The corresponding treatment standards and all applicable prohibitions ☐ Yes ☐ No

Manifest number ☐ Yes ☐ No

Waste analysis data, if available ☐ Yes ☐ No

Date the waste is subject to the prohibitions ☐ Yes ☐ No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?

☒ Yes ☐ No

D. Demonstration and Certification -- "Soft Hammer" Wastes *NA*

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

☐ Yes ☐ No

- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?

☐ Yes ☐ No

Addresses

☐ Yes ☐ No

Telephone Numbers

☐ Yes ☐ No

Contact dates

☐ Yes ☐ No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

☐ Yes ☐ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

_____ Yes _____ No

Describe the type of treatment and treatment facilities _____

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

_____ Yes _____ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

_____ Yes _____ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number _____ Yes _____ No

(ii) Manifest number _____ Yes _____ No

(iii) Waste analysis data,
if available _____ Yes _____ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

_____ Yes _____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes

(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ Yes _____ No

If yes, list types of waste treatment units and processes:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

_____ Yes _____ No

If yes, check the appropriate regulatory status:

_____ Interim status for storage

_____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

- B. Does the transporter mix, combine, or recontainerize wastes?

_____ Yes _____ No

- C. Is the waste treated in an exempt treatment process on-site?

_____ Yes _____ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☒ Yes ☐ No ☐ NA
 o California List ☐ Yes ☐ No ☐ NA
 o First Third ☐ Yes ☐ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

- a. What date was the waste analysis plan last revised? 1989

- b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: Safety Kleen - WPS (Waste Profile Sheets)

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

- d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

☐ Yes ☐ No ☐ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

- e. Describe the frequency of sampling: _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

☒ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☒ Yes ☐ No ☐ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

☐ Yes ☐ No ☒ NA

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

_____ Yes ☒ No _____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

_____ Yes _____ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

_____ Yes ☒ No _____ NA

Last Time Done in 1987

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

_____ Yes _____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

☒ Yes _____ No _____ NA

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments? *NA*

_____ Yes _____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment? *NA*

_____ Yes _____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No _____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

E. Land Disposal *NA*

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes _____ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

_____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

8. What is the volume of the restricted wastes disposed of to date?

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

APPENDIX A SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
carbon tetrachloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorinated fluorocarbons	<input type="checkbox"/> Yes	<input type="checkbox"/> No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichlorofluoromethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ortho-dichlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
acetone	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl acetate	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl benzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl ether	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methyl isobutyl ketone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
n-butyl alcohol	<input type="checkbox"/> Yes	<input type="checkbox"/> No
cyclohexanone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methanol	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes ☐ No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid
nitrobenzene

___ Yes ___ No
___ Yes ___ No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene
methyl ethyl ketone
carbon disulfide
isobutanol
pyridine

___ Yes ___ No
☒ Yes ___ No
___ Yes ___ No
___ Yes ___ No
___ Yes ___ No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

- (a) Are the constituents used as chemical carriers?

___ Yes ___ No

If yes, list the constituents.

- (b) Are the constituents used for degreasing/cleaning?

☒ Yes ___ No

If yes, list the constituents.

M.E.K., Acetone, 111 Trichloroethane

- (c) Are the constituents used as diluents?

___ Yes ___ No

If yes, list the constituents.

- (d) Are the constituents used as extractants?

☒ Yes ___ No

If yes, list the constituents.

Methanol

- (e) Are the constituents used for fabric scouring?
____Yes ____No

If yes, list the constituents.

- (f) Are the constituents used as reaction and synthesis media?
____Yes ____No

If yes, list the constituents.

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.)
____✓Yes ____No
8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
<u>68%</u>	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
<u>51%</u>	ethyl ether
100%	

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: UCAR Carbon Co Date of Inspection 4/5/89
 Address: 11709 Madison Ave. Cleveland, 44101 HWFB #: 02-18-0132
P.O. Box 6087 USEPA ID #: OH004167383
 County: Cuyahoga Facility Phone #: (216) 529-3751
 Facility Contact: Nyle Hillson Facility Contact Phone#: (216) 529-3751
 Safety Equipment #: _____
 Inspector(s) Name(s): Greg Taylor, Marian Toumazas

STATUS

Cond. Ex. SQG ___ SQG ___ Generator ☒ Transporter ___ Treatment ___ Storage ☒ Disposal ___

ACTIVITIES

Containers ☒ Tanks ☒ Surface Impoundments ___ Incineration/Thermal treatment ___

Waste pile ___ Land treatment ___ Landfill ___ Groundwater monitoring ___

Used oil burner ___ Hazardous waste fuel burner/blender ___

- | | | <u>Y/N/NA</u> | <u>REMARK #</u> |
|----|--|---------------|-----------------|
| 1. | Does the facility produce "discarded materials" as defined in 3745-51-02(A)? | <u>X</u> | _____ |
| 2. | Are they : | | |
| a. | Abandoned(disposed;incinerated;accumulated, stored, or treated prior to disposal)? | <u>X</u> | _____ |
| b. | Recycled? | <u>N</u> | _____ |
| c. | Inherently waste-like?(F020,F021,F022,F023,F026,F028)? | <u>N</u> | _____ |
| 3. | If recycled or accumulated, treated or stored before recycling, is the waste: | | |
| a. | Used in a manner constituting disposal? | <u>NA</u> | _____ |
| b. | Burned for energy recovery? | _____ | _____ |
| c. | Reclaimed? (Refer to Table 1 of 3745-51-02) | _____ | _____ |
| d. | Accumulated speculatively? | _____ | _____ |
| 4. | Is the material recycled by being: | | |
| a. | Used or reused as an ingredient in an industrial process to make a product without prior reclamation? | <u>NA</u> | _____ |
| b. | Used as an effective substitute for commercial products? | _____ | _____ |
| c. | Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock? | _____ | _____ |

		<u>Y/N/NA</u>	<u>REMARK #</u>
5.	Are LDR wastes generated? If so, complete appropriate LDR checklist.	<u>Y</u>	_____
6.	Has the facility submitted a Part A to Ohio?	<u>Y</u>	_____
7.	If yes, is it complete and accurate?	<u>Y</u>	_____
8.	If not accurate, has a PCR been submitted? If yes, what date was the PCR submitted?	<u>NA</u>	_____
9.	Is the facility operating in compliance with the terms and conditions of its HWFB permit?	<u>N</u>	_____
10.	Has the facility submitted a Part B?		
11.	Was advance notice of the inspection given? If so, how far in advance?	<u>Y</u>	<u>2 weeks</u>

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

Hazardous wastes are presently being generated in three areas:

- Boron Nitride Production - waste Methanol (F003) 30-40 drums per year.
- Brafoil Process - waste MEK & "Bondmaster Cement" (F005)
- Maintenance - Stoddard Solvent (D001) 1-2 drums per year

Waste are removed by Safety Kleen

Note that The "Karbate" process line was discontinued as was the paint generated wastes.

CAC 3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)

Y/N/NA REMARK #

1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)?
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))?
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG?
If so, complete appropriate checklist.
5. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a. All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22?
 - b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)?
 - c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)?
 - d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)?
 - e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))?
 - f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)?

Y _____

N _____

Y _____

NA _____

Y _____

Y _____

Y _____

Y _____

Y _____

Y _____

Y _____

		Y/N/NA	REMARK #
6.	Does the generator meet the following hazardous waste pre-transport requirements:	_____	_____
a.	Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)?	<u>Y</u> _____	_____
b.	Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons <u>or less</u> is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)?	<u>Y</u> _____	_____
c.	Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)?	<u>Y</u> _____	_____
7.	Does the generator import or export hazardous waste?	<u>N</u> _____	_____
	If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)?	_____	_____
8.	If the generator elects to accumulate hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days or less</u> without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:		
a.	The containers or tanks are clearly marked with the words "Hazardous Waste"?	_____	_____
b.	The date that accumulation began is clearly marked on each container?	_____	_____
c.	If the waste is accumulated in containers, the generator is complying with OAC 3745-66-71 to 3745-66-74 and 3745-66-76 to 3745-66-77? Complete <u>Management of Containers</u> checklist.	_____	_____

Y/N/NA REMARK #

- d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, 3745-66-91, 3745-66-92, 3745-66-94, and 3745-66-97 to 3745-66-99 except OAC 3745-66-97(C)? Complete Storage and Treatment in Tanks checklist. Y _____
- e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:
1. Quantities of waste accumulated do not exceed 55 gallons at any time? Y _____
 2. Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time? NA _____
 3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-55-71, 3745-55-72, 3745-55-73(A), 3745-55-76, and 3745-55-77? N * Open hung
 4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating? NA _____
9. Has the genertor accumulated hazardous wastes in excess of ninety (90) days? NA _____
10. Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days? NA _____
11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)? NA _____

		<u>Y/N/NA</u>	<u>REMARK #</u>
12.	Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34)	<u>N</u>	<u>Annual Training</u>
13.	Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records? [3745-52-34(A)(4)] (262.34)	<u>Y</u>	<u> </u>
14.	Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?	<u>Y</u>	<u> </u>
15.	Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete " <u>Preparedness and Prevention</u> " and " <u>Contingency Plan and Emergency Procedures</u> " checklists.	<u>Y</u>	<u> </u>

REMARKS, GENERATOR REQUIREMENTS

IC 3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?	<u>Y</u>	_____
2.	Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))	<u>N</u>	<u>Test Methods</u>
3.	a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	<u>N</u> *	_____
	b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))	<u>N</u>	_____
IF BOTH 3A and 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.			
4.	Does the facility have -		
	a. A 24-hour surveillance system, or	<u>Y</u>	_____
	b. An artificial or natural barrier <u>and</u> a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))	<u>Y</u>	_____
5.	Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)](265.14(c))	<u>Y</u>	_____
6.	a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)	<u>Y</u>	_____

- 21 -

Container Storage Areas A&B are fenced; Area C has not been used since 1982.
The facility is enclosed by a fence and has a surveillance system

		<u>Y/N/NA</u>	<u>REMARK #</u>
b.	Are areas subject to spills (i.e., loading and unloading areas, etc.) inspected daily when in use and according to other applicable regulations when not in use. [3745-65-15(B)(4)] (265.15(b)(4))	<u>NA</u>	_____
7.	Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (265.16(a)(b)(c))	<u>Y</u>	_____
8.	Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records. (265.16(d)(e))	<u>Y</u>	_____
9.	If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17](265.17)	_____	_____
a.	Protection from sources of ignition.	<u>Y</u>	_____
b.	Physical separation of incompatible waste materials.	<u>Y</u>	_____
c.	"No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>Y</u>	_____
d.	Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b))	<u>NA</u>	_____

CAC 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Is the facility operated to minimize the possibility of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	<u>Y</u>	_____
2.	Has there been a fire, explosion or non-planned release of waste at the facility?	<u>N</u>	_____
3.	If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32)		
a.	Internal alarm system?	<u>Y</u>	_____
b.	Access to telephone, radio or other device for summoning emergency assistance?	<u>Y</u>	_____
c.	Portable fire control equipment?	<u>Y</u>	_____
d.	Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	<u>Y</u>	_____
4.	Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	<u>Y</u>	_____
5.	If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	<u>Y</u>	_____
6.	If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	<u>Y</u>	_____
7.	If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	<u>Y</u>	_____

Y/N/NA REMARK #

8. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))

NA _____

C 3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

Y/N/NA REMARK #

1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):
 - a. Actions to be taken by personnel in the event of an emergency incident? Y _____
 - b. Arrangements or agreements with local or state emergency authorities? N _____
 - c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator? Y _____
 - d. A list of all emergency equipment including location, physical description and outline of capabilities? Y _____
 - e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.51(f))? Y _____
2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53) N _____
3. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54) Y _____
4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56) Y _____
5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j)) NA _____

C 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQ~

QUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

Y/N/NA REMARK #

1. Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:
 - a. Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1)).
 - b. Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?
 - c. The estimated (or actual) weight, volume or density of the waste material?
 - d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745-65-73(B)(2) (Part 265, Appendix I, Table 2)
 - e. The present physical location of each hazardous waste within the facility?
 - f. Records of incidents which require implementation of the Contingency Plan?
 - g. FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2))
 - h. Records of any waste analyses and trial tests required to be performed?
 - i. Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?
 - j. Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6);(265.73(b)(6))?

<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>NA</u>	<u> </u>
<u>NA</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>
<u>Y</u>	<u> </u>

	<u>Y/N/NA</u>	<u>REMARK #</u>
k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?	<u>Y</u>	_____
2. Has the o/o submitted an annual (biennial) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?	<u>Y</u>	_____
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.		
3. Are manifests received by the facility signed and dated? Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)	<u>NA</u>	_____
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?	_____	_____
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.	_____	_____
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?	<u>NA</u>	_____
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?	<u>NA</u>	_____

C.C. 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265, SUBPART G)

		<u>Y/N/NA</u>	<u>REMARK #</u>
1.	Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?	_____	_____
a.	A description of how each hazardous waste management unit will be closed in accordance with 265.11.	_____	_____
b.	A description of how final closure will meet the requirements of 3745-66-11 (265.111).	_____	_____
c.	An estimate of the maximum amount of hazardous waste in inventory.	_____	_____
d.	A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.	_____	_____
e.	The year closure is expected to begin and a schedule for the various phases of closure.	_____	_____
f.	A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.	_____	_____
2.	Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which effects the closure plan? [3745-66-12(C)] (265.112(c))	_____	_____
3.	Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process or 45 days if only have tanks, container storage or incinerator? [3745-66-12(D)] (265.112(d))	_____	_____
4.	Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	_____	_____

Facility recently submitted the ²⁸closure plan for review

		<u>Y/N/NA</u>	<u>REMARK #</u>
5.	Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))	_____	_____
6.	Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))	_____	_____
7.	Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)	_____	_____
8.	What permitted units at the facility have been closed in accordance with an approved Closure Plan?	_____	_____
9.	If closure was partial, list the regulated units which remain in use at the facility: _____		
10.	If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)	_____	_____
11.	Does the post-closure plan include:		
	a. A description of proposed ground water monitoring?	_____	_____
	b. A description of planned maintenance activities?	_____	_____
	c. The name, address and phone number of person/office to contact during the post-closure period?	_____	_____
12.	For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119)	_____	_____

Y/N/NA REMARK #

13.~96Has the owner of the property on which a disposal unit is located recorded on the deed that:

- a. The land has been used to manage hazardous waste and the type, quantity and location of waste?
- b. Land use is restricted pursuant to 3745-66-17?
 [3745-66-10] (265.119)

3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART I)

	Y/N/NA	REMARK #
1. Are hazardous wastes stored in containers which are:		
a. Closed [3745-66-73(A)] (265.173)?	<u>N</u>	<u>Satellite</u>
b. In good condition [3745-66-71] (265.171)?	<u>Y</u>	<u>* Accumulation</u>
c. Compatible with the wastes stored in them [3745-66-72] (265.172)?	<u>Y</u>	<u>Area</u>
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	<u>N</u>	<u>*</u>
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	<u>Y</u>	
4. Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	<u>Y</u>	
5. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	<u>Y</u>	
6. Are containers holding hazardous wastes stored separate from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	<u>NA</u>	

AC 3745-66 STORAGE AND TREATMENT IN TANKS (40 CFR PART 265, SUBPART J)

Applicability: This checklist applies to owners or operators of facilities that use tank systems for storing or treating hazardous waste.

Note: Tanks used to store or treat hazardous wastes containing no free liquids and that are inside a building with an impermeable floor, the Paint Filter Liquid Test must be used to confirm the absence or presence of liquids in the waste and tanks and sumps used as part of a secondary containment system are exempt from 3745-66-93 (265.193).

For generator who store wastes in tanks for less than 90 days use items 1-5, 18 and 22-25. Except that compliance with 3745-66-97(C) (265.197) is not required.

	<u>Y/N/NA</u>	<u>REMARK #</u>
1. For existing tank systems without secondary containment that meets 3745-66-93 (265.193) standards, does the owner/operator (o/o) have a written assessment on file at the facility that meets all of the following requirement? [3745-66-91(A)(B)] (265.191(a)(b))	<u>N</u>	_____
a. It is certified by an independent Professional Engineer (P.E.).	_____	_____
b. Design standards have been considered.	_____	_____
c. The characteristics of hazardous waste(s) that have been or will be handled have been considered.	_____	_____
d. Corrosion protection measures have been considered.	_____	_____
e. The age of the tank system has been estimated or documented.	_____	_____
f. A leak test for non-enterable underground tanks has been conducted.	_____	_____
g. A leak test or an internal inspection by qualified P.E. has been conducted for <u>other than</u> non-enterable underground tanks.	_____	_____
2. For tanks used to store or treat wastes which become hazardous wastes after July 14, 1986, has the o/o done the assessment within 12 months after the date the waste became a hazardous waste? [3745-66-91(C)] (265.191(c))	<u>NA</u>	_____

		Y/N/NA	REMARK #
3.	For all tanks <u>found to be leaking or unfit for use</u> as a result of the assessment the o/o has complied with 3745-66-96 265.196 [3745-66-91(D)] (265.191(d))	<u>NA</u>	_____
4.	For <u>new tank</u> systems, has the o/o obtained a written assessment certified by an independent qualified P.E. that includes all of the following? [3745-66-92(A)] (265.192(a))		
	a. Design standards	<u>NA</u>	_____
	b. The characteristics of hazardous waste to be stored or treated	_____	_____
	c. Corrosion protection	_____	_____
	d. Protection from vehicular traffic	_____	_____
	e. Adequacy of tank foundation, proper anchoring and effects of front leave.	_____	_____
5.	Does the o/o have on file at the facility, written statements, by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed, designed and that required repairs were performed [3745-66-92(G)] (265.192(g)). Does the statement address all of the following:		
	a. Inspection for damage and/or inadequate construction and installation and a statement that deficiencies were corrected before the tank system was covered or put into use. [3745-66-92(B)] (265.192(b))	<u>NA</u>	_____
	b. Proper backfilling; [3745-66-92(C)] (265.192(c))	_____	_____
	c. Tightness test, if the tank was found not to be tight proper repairs were made; [3745-66-92(D)] (265.192(d))	_____	_____
	d. Proper support and protection of auxiliary equipment; [3745-66-92(E)] (265.192(e))	_____	_____
	e. Supervision of the installation of field fabricated corrosion protection. [3745-66-92(F)] (265.192(f))	_____	_____

	Y/N/NA	REMARK #
6. Has the o/o obtained a variance from the secondary containment requirements of 3745-66-93 (265.193) from the (Regional Director) (Administrator). If yes, skip items 7 through 11.	<u>N</u>	_____
7. Has the o/o installed secondary containment which meets the requirements of 3745-65-93 (265.193) for each of the following classes of tank systems by the date specified. [3745-66-93(A)] (265.193)		
a. For all <u>new tank</u> systems prior to being put into service	_____	_____
b. For all <u>existing tanks</u> used to handle waste No.'s <u>F020, F021, F022, F023, F026, F027</u> , before January 12, 1989.	_____	_____
c. For <u>existing tank system of known and documentable age</u> , the later of January 12, 1989, or when the tank reaches 15 years of age.	<u>N</u>	_____
d. For <u>existing tank systems of undocumentable age</u> , by January 12, 1995 unless the facility is greater than seven years old before the facility is fifteen years old.	_____	_____
e. For tank systems used to handle materials that became hazardous wastes after January 12, 1987, within the time frames required in (a) and (b) above, except that the date the material becomes a hazardous waste plus two years must be substituted for January 12, 1989.	_____	_____
8. Was the secondary containment system(s) at the facility <u>designed, installed and is operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids.</u> [3745-66-93(B)] (265.193(b))	<u>N</u>	_____

9. Does the secondary containment system meet the following minimum requirements of 3745-66-93(C)] (265.193(c)):
- It is constructed or lined with compatible materials with sufficient strength to prevent failure.
 - It is placed on a foundation or base capable of providing support.
 - A leak detection system that is designed/operated to detect failure of primary or secondary containment or any release of hazardous waste in the secondary containment system within 24 hours or at earliest practicable time is provided.
 - It is sloped or designed to drain and remove liquid, liquid (including accumulated precipitation) is removed within 24 hours or in a timely manner.
10. Is the secondary containment system for tanks a liner (external to the tank), vault, double-walled tank or an equivalent device approved by the Director/Regional Administrator?
- a. External Liner
- Is the external liner designed and operated to contain 100% of the capacity of the largest tank?
 - Is the external liner designed and operated to prevent run-off and infiltration into the liner; or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?
 - Is the external liner free of cracks and gaps?
 - Does the external liner completely surround the tank and cover all earth likely to be contacted by waste during release?

Y _____Y _____N _____N _____Liner _____N _____Y
Y _____N _____

Y/N/NA REMARK #

b. Vault System

1. Is the vault system designed and operated to contain 100% of the capacity of the largest tank?
2. Is the vault system designed and operated to prevent run-off and infiltration into the vault system, or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?
3. Are chemically resistant water stops in place at all joints?
4. Is there a compatible interior coating or lining to prevent migration of waste into the concrete?
5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent formation or ignition of vapors?
6. Is the vault system provided with an exterior moisture barrier?

NA _____

c. Doubled-Walled Tank

1. Is the doubled-walled tank designed as an integral structure so any release from the inner tank is contained?
2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion?
3. Is the double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?

NA _____

11. Is ancillary equipment provided secondary containment and inspection daily (except above ground piping)?

Y _____

		Y/N/NA	REMARK #
12.	For tank systems for which secondary containment is not yet provided, does the o/o have on file at the facility a record of the following:		
	a. For non-enterable underground tanks, a leak test conducted at least annually.	<u>NA</u>	_____
	b. For all other tanks, an annual leak test or internal inspection by an independent P.E., and	_____	_____
	c. For tank systems found to be leaking or unfit for use as a result of the above tests or inspections, has the o/o complied with 3745-66-96 (265.196)? If no, this is a violation of [3745-66-93(I)(4)] (265.193(i)(4))	_____	_____
13.	Has the o/o of a tank system <u>with a variance from secondary containment at which a release of hazardous waste has occurred from the tank but has not migrated beyond the zone of engineering control</u> complied with 3745-66-96(A)(B)(C)(E)(F) and 265.196 (a)(b)(c)(e) and (f) decontaminated or removed contaminated soil. If soil cannot be removed, has the tank been closed?	<u>NA</u>	_____
14.	Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank and <u>has migrated from the zone of engineering control</u> complied with 3745-66-96(A)(B)(C) and (D) (265.196 (a)(b)(c) and (d) and 3745-66-93(G)(4)(b) and (c) and (265.193(g)(4)(b) and (c)?	<u>NA</u>	_____
15.	Has the o/o complied with the following for all tank systems until secondary containment is provided? [3745-66-93(I)] (265.193(i))		
	a. Non-enterable underground tanks have had an annual leak test?	<u>NA</u>	_____
	b. All other tanks have had an annual leak test or an internal inspection?	_____	_____

		<u>Y/N/NA</u>	<u>REMARK #</u>
16.	Does the o/o have on file at the facility a results of the assessments in No. 15? [3745-66-93(I)(3)] (265.93(i)(3))	<u>NA</u>	_____
17.	For tanks found to be leaking as a result of assessment in 3745-66-93(I)(1) through (3) (265 (i)(1) through (i)(3)), has the o/o complied with 3745-66-96 (265.196); [3745-66-93(I)(4)] (265.93(i)(4))	<u>NA</u>	_____
18.	Does the o/o follow the <u>general operating requirements</u> below: [3745-66-94] (265.94)		
	a. Hazardous waste treatment reagents are not placed in the tank or secondary containment if they can cause the system to leak, rupture, corrode, or otherwise fail.	<u>Y</u>	_____
	b. The o/o uses appropriate controls to prevent spills or overflows from the system.	<u>Y</u>	_____
	c. The o/o has complied with 3745-66-96 (265.196) when a leak or spill has occurred.	<u>NA</u>	_____
19.	Has the o/o documented the inspection required in 3745-66-95 (265.195), in the operating record of the facility, including the following:		
	a. Spill control equipment (daily).	<u>Y</u>	_____
	b. Above ground portion of the tank (daily).	<u>Y</u>	_____
	c. Data from leak detection equipment (daily).	<u>NA</u>	_____
	d. Construction materials and the immediate area surrounding the tank to detect signs of erosion or signs of releases of hazardous waste (daily).	<u>Y</u>	_____
	e. The cathodic protection system to confirm its proper operation within six months of its initial installation and annually thereafter.	<u>NA</u>	_____
	f. All sources of impressed current at least bi-monthly.	<u>NA</u>	_____

Y/N/NA REMARK #

20. Response to leaks or spills and disposition of leaking or unfit for use tanks. Has the o/o of a tank system or secondary containment system from which there has been a leak or spill or which is unfit for use removed the tank from service and satisfied the following requirements. 3745-66-96 (265.196)

- a. Immediately ceased flow into tank and investigated cause of release
- b. For release from tank system, removed waste to prevent further release within 24 hours of detection or earliest practicable time.
- c. For releases to a secondary containment system removed all released material within 24 hours or as timely as possible to prevent harm to human health and the environment.
- d. Immediately conducted a visual inspection of the release and prevented further migration and removed and disposed of any visible contamination of soil or surface water.
- e. Reported any release to the environment to the Director (Regional Administrator) within 24 hours unless it is less than 1 lb. and was cleaned up immediately.
- f. Submitted a report within 30 days of the release to Director (Regional Administrator).

<u>NA</u>	

21. Has the o/o closed the tank system or have the following requirements been satisfied: 3745-66-96(E)(1) (265.196(e)(1))

- a. The cause of the release was a spill which did not damage the tank system and the o/o returned the system to service.
- b. The cause of the release was a leak from the primary tank and the system was repaired and returned to service.
- c. If the source of the release was a leak from a component without secondary containment the component was provided with secondary containment or visually inspected above ground.

<u>NA</u>	

		Y/N/NA	REMARK #
	d. The o/o has obtained certification from an independent P.E. if the repairs were major (i.e., installation of liner, repair of ruptured primary or secondary containment vessel).	_____	_____
22.	Has the o/o completed closure of the tank system in accordance with 3745-66-97 (265.197)?	<u>NA</u>	_____
23.	For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)] (265.198(a))		
	a. The waste is treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o complied with 3745-65-17(B) (265.17(b)); or	_____	_____
	b. The waste is stored or treated to protect it from materials or conditions which may cause ignition or reaction; or	<u>X</u>	_____
	c. The tank is used solely for emergencies.	_____	_____
24.	If ignitable or reactive waste is stored or treated is it stored or treated in compliance with the NFPA flammable and combustible code (1971 or 1981)? [3745-65-17(B) (265.17(b)) is complied with?	<u>X</u>	_____
25.	Has the o/o not placed incompatible wastes or materials into the same tank system or into a tank system that has not been decontaminated and which previously held an incompatible waste or material unless 3745-65-17(B) (265.17(b)) is complied with? [3745-66-99] (265.199)	<u>NA</u>	_____
26.	In addition to conducting the waste analysis required by 3745-65-13 (165.13) when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-99] (265.200)		
	a. Conducted waste analysis and trial treatment storage tests.	<u>NA</u>	_____
	b. Obtained written documentation or similar waste under similar operating conditions.	_____	_____